



MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

Dated: March 26, 2020

New York

5 Third Avenue, 20th Floor
New York, NY 10022
Tel: 212.209.3050
Fax: 212.371.5500

Princeton

4 Independence Way
Princeton, NJ 08540
Tel: 609.514.1500
Fax: 609.514.1501

www.reitlerlaw.com

VIA ECF

Honorable Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: **Bridgeport Music, Inc., et al. v. Tufamerica, Inc., et al.; 19-cv-01764-PGG**

Dear Judge Gardephe:

We are the attorneys for defendant and counterclaimant TufAmerica, Inc. d/b/a Tuff City Records and defendant Kay Lovelace Taylor, individually and on behalf of the Estate of LeBaron Taylor, in the above-referenced action. We submit this letter jointly with all counsel of record to respectfully request an additional 60-day continuance of the current discovery schedule to accommodate unforeseen delays owing to the unprecedented circumstances of COVID-19.

Per our letter of March 9, 2020 [Doc. 43], the parties had planned on completing four party depositions in various states (Arizona, Michigan, and New York) by April 11, 2020 and taking a third-party deposition in Florida (pursuant to a subpoena which has now been served) before May 11, 2020. Counsel for the Plaintiffs is primarily based in Nashville, Tennessee, while Defendants' counsel is located in New York. Given the CDC's social distancing recommendations and the inherent health risks of traveling during this uncertain time, as well as the advanced age of many of the deponents, the parties have all consented to continue the depositions for the time being.

Given the foregoing, the parties jointly and respectfully request a 60-day extension of the current discovery schedule, which would move the current deadline to complete party depositions from April 11, 2020 to June 10, 2020, and the deadline for completion of fact discovery from May 11, 2020 to July 10, 2020. While counsel for the parties are hopeful that we will be able to meet these deadlines, a further adjournment may be necessary in the event that public officials continue to advise social distancing, quarantine, isolation, and/or lockdown measures which would impede travel.

Hon. Paul G. Gardephe

March 24, 2020

Page 2 of 2

With respect to the status conference presently scheduled for April 23, 2020, the parties respectfully request that the same either be adjourned to a date in June or July if an in-person appearance is required or that the parties be permitted to appear telephonically.

We thank the Court for its attention to and consideration of this request.

Respectfully Submitted,

s/ Brian D. Caplan

Brian D. Caplan

cc: All counsel of record (via ECF)